



**Fair Start for Kids Act (FSKA) Temporary Licensing
Subcommittee Meeting
Discussion Questions/Feedback**

July 27, 2022 – Virtual Meeting

Introductions

If a movie was being made of your life, which actor would you want to play you?

rowan atkinson i have no idea
a japanese actor lena horne
dakota johnson
jason bateman
natalie portman
reese witherspoon

FSKA TLS Final Review Pt. 1

All licensing materials are released in English, Spanish and Somali and non-English speaking providers have the same access to information/webinars/meetings as English-speaking providers.

- I want to clarify that this means that webinars will not be hosted separately but instead hosted with simultaneous translation for all.
- Equity and Inclusion is more than translation. Invest time and energy in developing community and shared learning. Do not silo by home language but honor language diversity in ways that supports and enriches all.

Create a tool, in place of the current checklist, that can be translated and used as a trial run with incoming providers and providers who would like more clarity on what is expected.

- Engage providers as the experts in creating the tool.

Providers should be able to request a hard copy of the Early Learning Licensing Guidebook in English, Spanish and Somali. WAC changes will be incorporated into the guidebook within 60 days of becoming law.

- We should be able to provide them free of charge for every classroom in our programs and one for administration. One per facility is ridiculous.



- The document should be updated and released at the same time each year, outside of an emergency WAC change, so providers can expect when to prepare for any changes/adjustments.
- Ensure that the online version of the Guidebook actually prints the way the hard copy is printed. Ensure this is a usable tool.

Schedule regular (quarterly?) meetings between the Licensing Division and Washington State providers.

- Leadership must be present at Provider Supports meetings.
- These meetings should not simply be sessions that say “I don’t know and we will get back to you” because there is never concrete follow through.
- Would also be great for transparency, to understand how often Licensors meet (what is their cadence). Who do they receive messaging from so that it is consistent.

Use CCDF funds to develop a call line staffed by licensors, or those with licensing knowledge, to answer providers questions, including anonymous questions.

- I agree with developing and implementing this tool. My question is why would the funding only be CCDF? Seems if this is for all providers, not just those who take WCCC, the department would need to use or cost allocate all child care funding streams to be equitable.

Provide a redacted copy of LD CPS allegations to providers.

- There needs to be a standard set as to what is an allegation. There have been times when a parent has had an allegation and when CPS cannot find validity in their home they investigate us with no reason behind this.
- Complaints should not be allowed to be anonymous to hold any merit whatsoever.
- Provider list of rights and responsibilities to hold providers and licensors accountable.
- Any accusation must be placed in writing. NO MORE GUILTY UNTIL PROVEN INNOCENT.
- Create as much transparency as possible.

Licensing Division CPS Investigation process is outlined and available to all providers via the DCYF website in multiple languages. When there is an active investigation, the outline of this process is emailed directly to the provider in the provider’s native language.

- And...since they don’t seem to have a written process that they can give to the providers, the Provider Supports committee should be involved in creating this process.
- What if there were videos and someone to call and ask questions about the process? Transparency and support should be the goal.

DCYF will make all provider feedback available and address what feedback was taken into account, what feedback was not (and why). Providers have the right to understand how their input is being used (or not being used) by DCYF.

- DCYF is here to support Early Learning Providers. We are private businesses. DCYF has one responsibility; minimum safety standards. No assessor of “high quality”.
- Please invite FSKA legislators (Sen Wilson and Rep Senn) to hear final recommendations before they are submitted.
- And invite FSKA legislators to a meeting in which DCYF explains why they will not be implementing some/all recommendations.
- DCYF should be held accountable to providers. Providers should get a report of what feedback influenced outcomes so that we can see if our work ever amounts to anything and is worthwhile at all.
- Agree and ensure providers understand what requirements are tied to federal funding etc. And, when possible share why the feds or other authority is requiring something.
- Providers should understand how Washington State funds child care and how that impacts requirements.



DCYF requirements and guidelines are in line with requirements from other state agencies, like the Fire Marshall, DSHS, DOH, etc. It is the responsibility of DCYF to align with other agencies and providers are responsible for aligning with DCYF requirements.

- Licensing should know exactly what thy expectations are from other agencies, as well. They are supposed to be a support for providers and we do not always know where to go for the accurate information.
- Licensing should always be our "go to" and be required to put their answers in writing, so that they cannot say they "didn't say that".
- Providers should feel in partnership with licnesing not like licensing is out to get us.
- Agree!

Build in a growth period for incoming providers who wish to be licensed, with gradual requirements.

- Create and enforce and application process for programs who currently claim they are exempt yet are actually operating unlicensed child care.
- Create a call line for providers and parents to report unlicensed care - NOT CPS. Parents do not want contact with CPS.
- I would like to understand this process better. I would want to ensure physical and SE safety for children and what the full implementation of licensing cadence would actually be.

Eliminate unnecessary training and education requirements that do not align with staff compensation. DCYF should eliminate mandates that do not come with funding for providers as this passes the cost on to families.

- DCYF must "stay in their lane!" Minimum safety standards should be their only responsibility.
- UNFUNDED MANDATES AND EDUCATION REQUIREMENTS ONLY ADD TO THE STRAIN ON PROVIDERS, AND MAKE AN EVEN MORE IMPOSSIBLE STAFFING CRISIS, WORSE!
- Provide STARS hours for all required trainings.
- Given the preponderance of feedback about fixing or eliminating EA, what is DCYF planning to do to course correct so the system actually works for child care?
- If DCYF wants to mandate training they should pay the staff direct for them. This is an added expense to an already strained budget for providers.
- It is often clear to me that providers do not understand Federal and other funding requirements. Shows up here in people's comments. Help providers understand that we, as a state, are bound to requirements when we take federal and other funding.
- To take the burden of cost off of early learning and care providers and staff (and ultimately parents), create a stipend system that pays staff directly and a sub pool that can support the provider while staff attend training.

Notify providers that a licensing visit will take place within 30-60 days.

- Provide the check-list that will be addressed ahead of time so we can meet the common goal... COMPLIANCE! DCYF, stop punitive and unprofessional practices. We are professional PRIVATE BUSINESS OWNERS.
- Again, help providers understand the WHY behind requirements, that all business have regulations and child care and early learning have more because it is funded with public dollars even if the provider does not take WCCC or other subsidy.
- Part of the federal requirement is the "unannounced" piece. Could a yearly quick unannounced visit monitoring for a couple of items meet the requirement? Then the formal licensing visit could be scheduled.
- Agree, create a reliable and predicable process for licensing visits.

Staff records are not required to be in MERIT if providers have paper records accessible.

- MERIT can't keep track of what they are already supposed to. Many of our staff have 30 hours STARS and we HAVE to keep the paper copies for licensing anyway!



- We all know the goal is that records be added to MERIT. Providers should not be written up during a monitoring visit if they have paper records. We all get busy.
- Agree. We are told that an employee's MERIT account belongs and is "owned" by them. Paper copies should always over-ride any MERIT out of compliance finding.
- Partner with providers to troubleshoot merit and improve the process. If providers have paper copies but have not entered in Merit this should have different weight than out of compliance.

FSKA TLS Final Review Pt. 2

Separate violations that are against an individual (employee) from true violations or complaints against the facility.

- Is it legal to site an "organization" vs. an individual? The organization did not directly cause harm to a child. Individuals, either through neglect or intent cause harm. It may occur at a location, however, it needs to be assigned to an individual.
- Violations directly related to a staff person should follow that staff and be viewable by other potential employers.

Eliminate the Emergency WAC around reporting openings and ensure staff members full names are not listed in Child Care Check to protect employee privacy.

- How is having this "emergency" WAC providing safety for children? Even if I have openings, it is my choice who I choose to serve. STAY IN YOUR LANE DCYF.

Separation between providers accepting subsidy and private pay organizations: Remove the ECE college requirements, Lower the number of years required to receive an employment waiver. Early Learning organizations who do not take any CCDF funding should be exempt from education requirements of their teachers as unfunded mandates directly pass the cost of childcare to the families.

- This is a good example of the blurred lines between bodies of rules. Bottom-line, what is the goal for the overall child care sector in our state when most of this work primarily impacts the subsidy part of the sector.
- Education requirements are too high (and an unfunded mandate) for ALL staff.
- If private pay organizations are not required to meet professional development requirements, then those accepting subsidy should not be required, as well.
- The rule-making has to be equitable and why should those accepting subsidy be forced to meet a higher, unfunded mandate?

Providers receive a survey after licensing visits to provide feedback and increase trust between providers and licensors.

- I recommend this language change: Providers receive a quality rating survey on the licensor to provide feedback for accountability and fidelity to the WACs.
- Every provider receives a survey. Every single time they interact with the licensor. Not just for monitoring visits.
- Surveys will not be answered truthfully when licensors will clearly know which sites have responded unless there is full transparency that they will not see the results. Providers wouldn't trust the system.
- The only way this could work is for a third party to collect the feedback. Feedback needs to be anonymous for it to be fully accurate.

IRR is clearly communicated to providers as optional, and DCYF sends a survey to providers to evaluate IRR/monitoring visits

- IRR, which is a training tool for new licensors, is clearly communicated as optional.
- Providers need much more information about this system. It's not being well publicized.



Use Quality Improvement (QI) funds to support the EA Review Process and develop a different avenue to demonstrate quality child care in order to receive subsidy (WCCC), not EA as the only option.

- I'd like clarity on what this recommendation means
- Look at all of the EA requirements with an equity lens. Too many of requirements are based on white-dominant viewpoints starting with the education requirements.

Increase payments for providers who participate in Early Achievers, and base payments on provider rates.

- To incentivize providers to accept WCCC subsidies, DCYF should increase subsidy payments to 100% now.
- Wondering the reasons behind the low numbers of family participation in WCCC. What is the state's goal for family participation?
- Create an incentive for achieving a 3.5 rating. It was acknowledged that the space between a 3 and a 4 was too big, so they created a 3.5. Now fund it.
- Close the gaps between regions. Some regions get paid half as much as others and it does not cost half as much to provide the care. It is regional discrimination that further discriminates children and staff in impoverished areas.

Create an Organizational Access level in MERIT so centers with multiple sites can approve directors, view center dashboards across multiple sites, etc., employers can, submit records on behalf of employees, list all early learning employment for individuals in MERIT, and create an inactive status for employees who work on summer breaks or only occasionally. Create a link to WA Compass within MERIT to help providers access WA Compass.

- Easier way to make changes to staff that have access to facility tab in MERIT.
- Let employers add education records in merit some staff are technically challenged and find the process challenging to do on their own. They work during help line hours and struggle to get help from merit support.

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Please share any additional recommendations you think should be included in the FSKA TLS
Recommendation Report

- I think the report should include a recommendation to re-examine EA and change it to respond to real world service delivery of child care and provider feedback.
- Grant structures in regards to FSKA funds should be established and outlined in correlation with providers input to ensure they are more equitable.
- Deep analysis of each WAC change/adjustment to understand estimated costs to providers and eliminate unfunded mandates (ex. self-closing, self-latching gates)
- As with stabilization grants, DCYF grants should not be competitive such that providers are competing for funds. Grants can easily be allocated based on licensed capacity.
- Required consistency of licensing all Early Learning programs between DCYF and OSPI (if the health and safety requirements are deemed necessary for a 4 year old in a Licensed Care space then they should be the same for a TK space as well. Otherwise ... it makes providers wonder why the safety requirements are in place if it is not important for all 4 year old spaces to have those requirements.

Mentimeter Responses

Overall, I felt today's meeting was productive and a good use of my time.

